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Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re

BEVERLY MONIQUE MURRAY-
CALCOTE,

Debtor.

Case No.: 2:17-bk-11972-RK

Chapter 7

**STIPULATION TO CONTINUE CHAPTER
7 TRUSTEE'S MOTION FOR ORDER: (1)
COMPELLING THE DEBTOR'S
COOPERATION WITH THE TRUSTEE
PURSUANT TO 11 U.S.C. § 521; AND (2)
REQUIRING TURNOVER OF PROPERTY
OF THE ESTATE PURSUANT TO 11
U.S.C. § 542**

Current Hearing Date:

Date: July 25, 2017

Time: 2:30 p.m.

Place: Courtroom 1675

United States Bankruptcy Court
255 E. Temple Street
Los Angeles, CA 90012

[Proposed] Continued Hearing Date:

Date: August 22, 2017

Time: 2:30 p.m.

Place: Courtroom 1675

United States Bankruptcy Court
255 E. Temple Street
Los Angeles, CA 90012

**TO THE HONORABLE ROBERT KWAN, UNITED STATES BANKRUPTCY JUDGE;
AND ALL INTERESTED PARTIES:**

This Stipulation to Continue the Chapter 7 Trustee's Motion For Order: (1) Compelling the Debtor's Cooperation With The Trustee Pursuant To 11 U.S.C. § 521; And (2) Requiring Turnover Of Property Of The Estate Pursuant To 11 U.S.C. § 542 (the "Stipulation") is entered into by Rosendo Gonzalez, Chapter 7 Trustee (the "Trustee") for the bankruptcy estate of Debtor Beverly Monique Murray Calcote (the "Debtor"), on the one hand, and the Debtor on the other hand (together, with the Trustee, the "Parties"), by and through their respective counsel of record, as follows:

I. RECITALS

A. On February 17, 2017, the Debtor filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code (the "Bankruptcy Case"). The Trustee was subsequently appointed chapter 7 trustee in the Debtor's Bankruptcy Case, in which capacity he continues to serve.

B. On June 26, 2017, the Trustee filed his "Motion for Order: (1) Compelling the Debtor's Cooperation With the Trustee Pursuant To 11 U.S.C. § 521; And (2) Requiring Turnover Of Property Of The Estate Pursuant To 11 U.S.C. § 542 (the "Motion", Dkt. No. 35). The Motion seeks to have the Debtor amend her schedules to disclose undisclosed assets and turn over documentation relating to the undisclosed assets.

C. On July 13, 2017, the Debtor filed Amended Schedules A, B, C, D, F, H and Amended Statement of Financial Affairs (Dkt. No. 39 and 41).

D. On July 13, 2017, the Debtor filed a declaration in response to the Motion (the "Declaration", Dkt. No. 42). The Declaration asserts, among other things, that the Debtor will provide documents responsive to the Trustee's request in the Motion.

E. On July 18, 2017, the Debtor provided voluminous documents, including bank statements and tax returns, to the Trustee which she asserts are responsive to the

1 Motion. In addition, the Debtor is still in the process of producing additional responsive
2 documents to the Trustee.

3 F. As such, the Parties have now mutually agreed to continue the hearing on
4 the Motion for approximately 30 days in order to allow the Debtor additional time to
5 provide all responsive documents, and for the Trustee to review such documents.

6 G. The Parties submit that a continuance of the Motion will preserve Judicial
7 Economy.

8 **NOW, THEREFORE**, in consideration of the foregoing, the Parties, by and through
9 their respective attorneys of record, hereby agree and stipulate as follows:

10 **II. STIPULATION**

- 11 1. The Recitals above are incorporated into this Stipulation.
12 2. The Motion shall be continued to August 22, 2017 at 2:30 p.m., or such other date
13 and time available on the Court's calendar after this proposed date.
14 3. This Stipulation may be executed in counterparts, which taken together shall be
15 considered a single document. In addition, facsimile or Portable Document
16 Format (PDF) signatures shall be treated as original signatures.
17
18

19 Dated: July 18, 2017

MARGULIES FAITH LLP

20
21 By: /s/ Noreen A. Madoyan
22 JEREMY W. FAITH
23 NOREEN A. MADOYAN
Attorney for Chapter 7 Trustee,
Rosendo Gonzalez

24 Dated: July 19, 2017

OAKTREE LAW

25
26 By: [Signature]
27 JULIE VILLALOBOS
28 Attorney for Debtor,
Beverly Monique Murray Calcote

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
16030 Ventura Blvd., Suite 470, Encino, CA 91436

A true and correct copy of the foregoing document entitled **STIPULATION TO CONTINUE CHAPTER 7 TRUSTEE'S MOTION FOR ORDER: (1) COMPELLING THE DEBTOR'S COOPERATION WITH THE TRUSTEE PURSUANT TO 11 U.S.C. § 521; AND (2) REQUIRING TURNOVER OF PROPERTY OF THE ESTATE PURSUANT TO 11 U.S.C. § 542** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 19, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Jeremy Faith Jeremy@MarguliesFaithlaw.com,
Helen@MarguliesFaithlaw.com;Noreen@MarguliesFaithlaw.com;Victoria@MarguliesFaithlaw.com;Brian@MarguliesFaithlaw.com
Rosendo Gonzalez (TR) rgonzalez@ecf.epiqsystems.com,
vbowen@gonzalezplc.com,khernandez@gonzalezplc.com,rossgonzalez@gonzalezplc.com
Noreen A Madoyan Noreen@MarguliesFaithLaw.com,
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United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
Julie J Villalobos julie@oaktreelaw.com, oakecfmail@gmail.com;r51108@notify.bestcase.com
Zann R Welch ecfnofices@ascensioncapitalgroup.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL OR CERTIFIED MAIL (state method for each person or entity served):

On **July 19, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR: Beverly Monique Murray-Calcode, 3166 West Ave M-2, Lancaster, CA 93536

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 19, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA FEDEX:

JUDGE'S COPY: Hon. Robert N. Kwan, U.S. Bankruptcy Court, 255 E. Temple Street, Ste 1682, Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 19, 2017
Date

Victoria Castrellon
Printed Name

/s/ Victoria Castrellon
Signature